

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

ALISON O'DONNELL,

Plaintiff,

vs.

UNIVERSITY HOSPITALS HEALTH  
SYSTEM, *et al.*,

Defendants.

) CASE NO. 1:16-CV-2480

) JUDGE DONALD C. NUGENT

6/12/17  
Motion Std.  
Donald C. Nugent

**JOINT MOTION FOR PROTECTIVE ORDER**

Pursuant to Rule 26(C) of the Federal Rules of Civil Procedure, Defendants University Hospitals Cleveland Medical Center (misnamed in the Complaint as University Hospitals Health System), Naveen Uli, Sumana Narasimhan, Rose Gubitosi-Klug, and William Rebello, move this Court to enter the attached Stipulated Protective Order in the above-captioned action to govern the use of confidential information in certain documents that will be produced during the course of discovery in this case.

Respectfully submitted,

/s/ Fred M. Bean

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